

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE FIFTEENTH JUDICIAL CIRCUIT
COUNTY OF GEORGETOWN)	Civil Action No.:
VERLIE EDWARDS, and)	
MARIO G. EDWARDS,)	SUMMONS
Plaintiffs,)	
)	(Jury Trial Demanded)
vs.)	
)	
TRACTOR SUPPLY COMPANY,)	
and UNIFIRST CORPORATION,)	
<u>Defendants.</u>)	

TO THE DEFENDANTS ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint herein, a copy of which is herewith served upon you, and to serve a copy of your Answer to this complaint upon the subscriber, at the address shown below, within thirty (30) days after service hereof, exclusive of the day of such service. If you fail to answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in the Complaint.

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April 4, 2022

Fayetteville, Ga.

litigation occurred in whole or in part in Georgetown County, South Carolina.

FACTS

7. Plaintiffs re-allege and incorporate the factual allegations of the preceding paragraphs as if fully set forth herein.

8. Defendant Tractor Supply Co is an agricultural retail chain that public investors own.

9. That upon information and belief, at all times relevant herein, Defendant UNIFIRST Corporation owned, manufactured, provided, supplied, and serviced the floor mat placed at the entrance door of Defendant Tractor Supply Company's store on or about April 22, 2019, wherein Plaintiff Mario Edwards (hereinafter referred to as Mr. Edwards) tripped, slipped, fell and sustained injuries.

10. On or about April 22, 2019, Mr. Edwards entered Defendant Tractor Supply Company's retail store located at 1295 N Fraser St., Georgetown County, South Carolina, as a patron and invitee to benefit the defendant Tractor Supply Company. Mr. Edwards, through no fault of his own, tripped, slipped, and fell on a disarrayed floor mat with turned-up edges that were not placed securely on the floor.

FOR A FIRST CAUSE OF ACTION

PREMISES LIABILITY

11. Plaintiffs re-allege and incorporate the factual allegations of the preceding paragraphs as if fully set forth herein.

12. Mr. Edwards was an invitee on Defendant Tractor Supply Company's premises. Defendant, Tractor Supply Company, and Defendant UNIFIRST owed Plaintiff the duty to discover and warn of dangerous conditions on the premises and thereafter make them safe, which the Defendants, Tractor Supply Company, and UNIFIRST failed to do.

13. The Defendants, and each of them, knew or should have known that a dangerous condition existed.

14. Upon information and belief, the Defendants, were further negligent, careless, wanton, and willful in the time and place above-mentioned, and acted with a reckless disregard

for the rights of Plaintiff, in the following particulars:

In failing to keep the floors safe for customers.

- a. In creating and in allowing the hazardous condition to exist.
- b. In failing to provide safe conditions for customers.
- c. In failing to discover and correct any dangerous conditions which existed adequately.
- d. In failing to remedy, fix, or otherwise cure a dangerous condition under its direct control when it knew or should have known of its existence.
- e. In failing to properly train or supervise their employees to prevent dangerous conditions from existing;
- f. In failing to adequately warn customers that a dangerous condition existed.
- g. In failing to take other reasonable measures to address the hazardous condition when it knew or should have known of its existence.
- h. In failing to observe proper safety precautions.
- i. In failing to staff the store adequately; and
- j. In such other and further particulars as the evidence at trial might show.

15. All or any one of the particulars enumerated above were the direct and proximate cause of the injuries and damages suffered by Mr. Edwards as set forth above

16. Mr. Edwards was acting reasonably prudent at all times relevant hereto.

17. As a result of the above, Mr. Edwards suffered painful injuries, internally and externally, to various parts of his body, including, but not limited to his face, hips, back, and legs, all of which have caused and will continue to cause Mr. Edwards much physical pain, mental anguish, suffering, humiliation and embarrassment, impairment of health and body efficiency, alteration of lifestyle, and has and will cause Mr. Edwards to incur costs for medical services and other matters related to his injuries and treatment.

FOR A SECOND CAUSE OF ACTION
LOSS OF CONSORTIUM

18. Plaintiffs re-allege and incorporate the factual allegations of the preceding paragraphs as if fully set forth herein.

19. At the time of the incident complained of Plaintiff Velie Edwards, and Plaintiff

Marion Edwards were husband and wife and continue to be married.

20. As a result of the wrongful and negligent acts and omissions of the defendants, Plaintiff Mario Edwards was injured, and the Plaintiffs were caused to suffer a loss of consortium, loss of society, affection, assistance, and conjugal fellowship, all to the detriment of their marital relationship.

21. The Plaintiffs are informed and believe that they are entitled to a judgment against Defendants for actual damages, a reasonable sum of punitive damages, the costs of prosecution of this action, prejudgment interest, and such other, and further relief as the Court may deem just and proper.

WHEREFORE, the Plaintiffs pray that the Court inquire into the matters herein and grant them each a judgment in a reasonable sum of actual damages, punitive damages, costs, and such other and further relief as the Court may deem just and proper.

Respectfully submitted,

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